



June 1, 2021

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Re: DCOI MUP, EPA Reg. No. 3008-XXX
Application to register a manufacturing use product for wood preservative uses

Enclosed is an application to register **DCOI MUP**, a manufacturing use product. The use is for formulation or repackaging into end-use products only intended for the wood preservative industry. DCOI MUP contains the active ingredient 3(2H)-Isothiazolone, 4,5-dichloro-2-octyl- or 4,5-Dichloro-2-n-octyl-3(2H)-isothiazolone (DCOIT) (PC 128101). This product is substantially similar to Kathon 287T Industrial Microbicide, EPA Reg. No. 707-224.

The PRIA Action code is A560, with a fee of \$13,226. Product Chemistry is submitted with this application. We are using selective method of support the remaining data. Offer to pay compensation letters were sent to the companies listed at the end of the Data Matrix. A separate application for InPro DCOI Preservative (a 100% repack of DCOI MUP) is being submitted at the same time as a secondary application.

Request for wider certified limits: Since the purity of DCOIT can be 100%, we hereby request lower limits of the impurities to be zero. Also, in the preliminary analysis, the highest level of moisture (water) detected was 0.33%. We request a wider upper limit for water to account for this moisture value.

Please find the following documents to support this application:

1. Application, form 8570-1;
2. Basic CSF, form 8570-4, dated 6/1/2021;
3. Certification with Respect to Citations of Data, form 8570-34;
4. EPA and Public versions of the Data Matrix, form 8570-35;
5. Proposed label in pdf format;
6. Receipt for online PRIA payment of \$13,226; and
7. A copy of the following product chemistry studies.

MRID Number	Guidelines	Study
51560201	830.1550, 830.1600, 830.1620, 830.1670, 830.1750, 830.1900	Richardson, L.A. (2021). DCOIT MUP Product Chemistry Group A Unpublished report by Koppers Performance Chemicals Inc., Inc. 13 p. with Confidential Attachment.
51560202	830.1700	Ansah-Johnson, L. (2021) DCOIT-97: Preliminary Analysis. Study Number 54032. Unpublished study by Product Safety Labs. 32 p. with Confidential Attachment.
51560203	830.6317, 830.6320	Ansah-Johnson, L. (2021) DCOIT-97: Accelerated Storage Stability and Corrosion Characteristics. Study Number 54107. Unpublished study by Product Safety Labs. 27 p

51560204	830.1800	Ansah-Johnson, L. (2021) DCOIT-97: Enforcement Analytical Method for the Determination of 4,5-Dichloro-2-n-octyl-4-isothiazolin-3-one (DCOIT) by High Performance Liquid Chromatography. Study Number 54107 EAM. Unpublished study by Product Safety Labs. 12 p
51560205	830.6302, 830.6303, 830.6304, 830.6313, 830.6319, 830.7000, 830.7050, 830.7200, 830.7220, 830.7300, 830.7370, 830.7570, 830.7840, 830.7950	Wo, C. (2021) DCOIT-97: Physical and Chemical Characteristics: Color, Physical State, Odor, Stability to Normal and Elevated Temperatures Metal and Metal Ions, Miscibility, pH, UV/Visible Absorption, Melting Point, Boiling Point, Bulk Density, Dissociation Constant, Partition Coefficient, Water Solubility, and Vapor Pressure. Study Number 54033. Unpublished study by Product Safety Labs. 123 p

If you have any questions regarding this submission, please contact me. I may be reached by phone at 770-233-4244 or by email at RichardsonLA@Koppers.com.

Sincerely,



Leigh Ann Richardson
Sr. Manager Regulatory Affairs